

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

AFFIDAVIT OF VICKI-LYN WARREN

VICKI-LYN WARREN, being first duly sworn, deposes and states:

1. That this Affidavit is made of my own personal knowledge and based on my review of Jail clinic records and that if I am sworn to testify, I can give competent testimony of my own personal knowledge and review of Jail clinic records in support of each paragraph of this Affidavit.
2. That I have been employed by Wellpath since March 1, 2012. Wellpath is an outside contractor for the Oakland County Sheriff's Office. Wellpath provides

medical and dental services for the inmate population at the Oakland County Jail. At all times relevant to the instant action I have worked as the Health Services Administrator for the Oakland County Jail since 2014.

3. In regard to inmate Richard Watkins, Mr. Watkins was tested for COVID-19 on May 6, 2020.
4. On May 8, Mr. Watkins was informed he had tested negative for COVID-19.
5. Mr. Watkins was told he had tested negative due to human error that was discovered shortly after Mr. Watkins was told of same.
6. In reality, Mr. Watkins had tested positive for COVID-19.
7. Mr. Watkins was informed of the human error by Wellpath staff within two hours of originally being told he had tested negative.
8. Mr. Watkins was immediately removed from his cell after being informed he had tested positive.
9. The row of Mr. Watkins' cell location (A4) was placed on quarantine consistent with current jail practices.
10. Nothing about Mr. Watkins' positive test changes the truth and veracity of my testimony regarding test results of the OCJ inmate population at the time it was given.
11. The initiative to test the entire OCJ inmate population which began on May 1, 2020 is complete. During this initiative, 468 inmates have been tested, 186

inmates have refused to be tested and 3 inmates have tested positive for COVID-19.

Further, Affiant sayeth not.

Dated: May 12, 2020

/s/Vicki-Lyn Warren

VICKI-LYN WARREN

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above Affidavit. I am an attorney admitted to the Eastern District of Michigan. On April 19, 2020, I personally spoke with VICKI-LYN WARREN and read this Affidavit to her. VICKI-LYN WARREN told me that the information in the above Affidavit is true, and gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Steven M. Potter (P33344)

Steven M. Potter (P33344)

Attorney for Defendants